

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: LIQUID ALUMINUM
SULFATE ANTITRUST
LITIGATION**

Civil Action No. 16-md-2687
(JLL)(JAD)

MDL No. 2687

*This Document Relates to: Putative Class
of Indirect Purchaser Plaintiffs*

**DECLARATION OF CORMAC T. CONNOR IN SUPPORT OF
DEFENDANT GEO SPECIALTY CHEMICALS, INC.'S FED. R. CIV. P.
12(B)(6) MOTION TO DISMISS INDIRECT PURCHASER PLAINTIFFS'
COMPLAINT**

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Attorneys for Defendant GEO Specialty Chemicals, Inc.

CORMAC T. CONNOR, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am a member of the law firm of Kirkland & Ellis LLP, which, together with Thompson Hine LLP, represents Defendant GEO Specialty Chemicals, Inc. (“GEO”). I submit this Declaration in support of Defendant GEO Specialty Chemicals, Inc.’s FED. R. CIV. P. 12(B)(6) Motion to Dismiss Indirect Purchaser Plaintiffs’ Complaint with prejudice as to claims relating to any conduct prior to December 31, 2004.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Debtors’ Third Modified Joint Plan of Reorganization Under Chapter 11, Title 11, *In re GEO Specialty Chemicals, Inc., et al*, Case No. 04-19148 (MS) (Bankr. D. N.J. Nov. 22, 2004) (Dkt. 887).

3. Attached hereto as Exhibit 2 is a true and correct copy of the Order Confirming Debtors’ Third Modified Joint Plan of Reorganization Under Chapter 11, Title 11, *In re GEO Specialty Chemicals, Inc., et al*, Case No. 04-19148 (MS) (Bankr. D. N.J. Dec. 20, 2004) (Dkt. 1014).

4. Attached hereto as Exhibit 3 is a true and correct copy of the Chapter 11 Voluntary Petition on behalf of GEO Specialty Chemicals, *In re GEO Specialty Chemicals, Inc., et al*, Case No. 04-19148 (MS) (Bankr. D.N.J. Mar. 18, 2004) (Dkt. 1)

5. Attached hereto as Exhibit 4 is a true and correct copy of certain excerpts of the Affidavit of the Trumbull Group, L.L.C., *In re GEO Specialty Chemicals, Inc., et al*, Case No. 04-19148 (MS) (Bankr. D. N.J. Jan. 25, 2005) (Dkt. 1073).

6. Attached hereto as Exhibit 5 is a true and correct copy of the Affidavit of the Trumbull Group, L.L.C. Regarding Publication of Debtor's Notice of Bar Date for Filing Proofs of Claim or Interest, *In re GEO Specialty Chemicals, Inc., et al*, Case No. 04-19148 (MS) (Bankr. D. N.J. July 26, 2004) (Dkt. 493)

7. Attached hereto as Exhibit 6 is a true and correct copy of the Affidavit of the Trumbull Group, L.L.C. Regarding Publication of Notice of Entry of Order Confirming the Third Modified Joint Plan of Reorganization, *In re GEO Specialty Chemicals, Inc., et al*, Case No. 04-19148 (MS) (Bankr. D.N.J. Jan. 27, 2005) (Dkt. 1082)

8. Attached hereto as Exhibit 7 is a true and correct copy of the Notice of Chapter 11 Bankruptcy Case, Meeting of Creditors, & Deadlines, *In re GEO Specialty Chemicals, Inc., et al*, Case No. 04-19148 (MS) (Bankr. D.N.J. May 22, 2004) (Dkt. 270)

9. Attached hereto as Exhibit 8 is a true and correct copy of the Affidavit of the Trumbull Group, L.L.C. Regarding Service of the Notice of Bar Date for Filing Proofs of Claim or Interest and Proof of Claim Form, *In re GEO Specialty*

Chemicals, Inc., et al, Case No. 04-19148 (MS) (Bankr. D.N.J. July 14, 2004)

(Dkt. 454)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 22, 2016.

s/ Cormac T. Connor
Cormac T. Connor